

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION

IN RE: §  
§  
DAVID MOBLEY, § CASE NO. 22-60004-V-11  
DEBTOR. §  
§ Confirmation set:  
§ **FEBRUARY 20, 2024**

**AMENDED OBJECTION TO CONFIRMATION  
OF THE AMENDED CHAPTER 11 PLAN**

**TO THE HONORABLE U.S. BANKRUPTCY JUDGE:**

COMES NOW, Santander Consumer USA, Inc. dba Chrysler Capital ("Santander" or "Creditor"), objecting to the confirmation of the Amended Chapter 11 Plan proposed by David Mobley ("Debtor"), and for cause of action would respectfully show the Court as follows:

1. Creditor has a perfected purchase money security interest in a 2018 Dodge Charger, Vehicle Identification Number 2C3CDXBG8JH197425. As of the date of filing, Creditor was owed \$24,567.49.

2. The value set forth in the Amended Chapter 11 Plan is too low. The retail value is \$29,100.00. A true and correct copy of the N.A.D.A. valuations page is attached hereto as Exhibit "A" and incorporated herein by reference.

3. Santander objects to releasing its lien unless and until the full value of its claim is paid in full per the terms of the Plan.

WHEREFORE, PREMISES CONSIDERED, Santander Consumer USA, Inc. dba Chrysler Capital prays for an Order of this Court:

1. Denying confirmation of Debtor's Amended Chapter 11 Plan as proposed; and
2. For such other and further relief, both general and specific, to which Creditor may show itself justly entitled.

Respectfully submitted,  
/s/ Stephen G. Wilcox  
Stephen G. Wilcox  
State Bar Number 21454300  
WILCOX LAW, PLLC  
P.O. Box 201849  
Arlington, Texas 76006  
(817) 870-1694 Telephone  
swilcox@wilcoxlaw.net

ATTORNEY FOR SANTANDER  
CONSUMER USA, INC. DBA  
CHRYSLER CAPITAL

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing Amended Objection to Confirmation of the Amended Chapter 11 Plan was served by FIRST CLASS MAIL, POSTAGE PRE-PAID on:

David Mobley  
3815 Montgomery Road  
Richmond, TX 77406

and ELECTRONICALLY FILED on:

Jerome Brown  
13900 Sawyer Ranch Road  
Dripping Springs, TX 78620-4359

Melissa Haselden  
Penzoil Place  
700 Milam, Suite 1300  
Houston, TX 77002

Dated on February 14, 2024.

/s/ Stephen G. Wilcox  
Stephen G. Wilcox

8323-00703-579851